

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **96**

Enw / Name: **BH&HPA [2733]**

Rhan: **POLISI TWR3**

Section: **POLICY TWR3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Dylai Polisi TWR3 ddyfarnu ceisiadau cynllunio am feysydd carafanau gwyliau sydd yn yr AHNE a'r Ardal Tirwedd Arbennig yn erbyn set gyffredin o feini prawf a ddylai fod yn berthnasol i'r holl barciau. Os gall cynigion datblygu ddangos gwelliannau amgylcheddol sylweddol i ddyluniad, gosodiad ac edrychiad parc gwyliau, yna dylid eu hannog, waeth lle y cânt eu lleoli. Os caiff effaith gyffredinol safle ei gostwng a/neu fod hyn yn arwain at fanteision economaidd sylweddol, yna nid oes rheswm cadarn dros eithrio llecynnau ychwanegol. Rhaid i'r ysgogiad fod yno i gynorthwyo i ariannu'r prosiectau datblygu hyn a allai, yn aml iawn, fod yn ddrud. Newid y polisi trwy: 1. Dileu pwynt 32. Newid pwynt 4 i alluogi cynigion i wella safleoedd carafanau statig a chalet presennol trwy alluogi estyniad bach i faint y safle, ac/neu Ail leoli unedau ac/neu Cynydd bach yn y nifer o unedau yn ddarostyngedig i feini prawf manwl. Gweler sylw llawn am eirfa penodol a gynnigir.

Representation Summary:

Policy TWR3 should adjudge planning applications for holiday caravan parks located within the AONB and SLA's against a common set of criteria which should apply to all parks. If a development proposals can demonstrate significant environmental improvements to the design, layout and appearance of a holiday park then they should be encouraged regardless of where they are located. If the overall impact of an existing site is reduced and/or significant economic benefits would result, then there is no sound reason to preclude against additional pitches. The incentive needs to be there to assist in funding these often expensive development projects.

Amended Policy

1. Delete Point 3
2. Amend Point 4 to allow proposals to improve existing static caravan and chalet sites by allowing minor extension to site area, and/or The relocation of units and/or, A minor increase in the number of units on site subject to detailed criteria. See full submission for detailed text.

Sylw Llawn / Full Representation:

REPRESENTATIONS ON BEHALF OF THE BRITISH HOLIDAY AND HOME PARK ASSOCIATION (BH&HPA)

We act on behalf of the British Holiday and Home Park Association (BH&HPA) and provide the following representation to Draft Policy TWR3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation of the Anglesey and Gwynedd Deposit Joint Local Development Plan (2011 - 2016) as follows;

National Planning Policy

Planning Policy Wales (PPW) Edition 7 (July 2014) provides material guidance as to how Development Plan Policies throughout Wales should be planned and formulated. With specific reference to the tourism industry the Welsh Assembly Government's aim for tourism is for:

"Tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental well-being of Wales"

Paragraph 11.1.7 of PPW additionally states that states that:

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"In rural areas, tourism related development is an essential element in providing for a healthy, diverse, local and national economy. It can contribute to the provision and maintenance of facilities for local communities. Here too development should be sympathetic in nature and scaled to the local environment and to the needs of visitors and the local community."

Paragraph 12 of TAN 13 (Tourism) states that;

"In preparing development plans, local planning authorities should investigate the adequacy of facilities for both the static and touring caravanner and reconcile these needs with the protection of the environment. Holiday and touring caravan parks are an important part of the self-catering holiday sector and can contribute as much to the local tourism economy as serviced holiday accommodation, while using less land for the purposes."

2c. POLICY TWR3: STATIC CARAVAN AND CHALET SITES AND PERMANENT ALTERNATIVE CAMPING ACCOMMODATION

It is submitted that Policy TWR3, as presently drafted, fails the following tests of soundness:

Test C1 - Section 3 (iii) of this policy does not allow any additional static caravan or chalet units on sites within the Anglesey Coast Area of Outstanding Natural Beauty (AONB), Llŷn Area of Outstanding Natural Beauty (AONB) or designated Special Landscape Areas (SLA's).

This is not consistent with Section 4 of the same Policy which does allow additional units on sites outside of the Anglesey Coast Area of Outstanding Natural Beauty, Llŷn Area of Outstanding Natural Beauty and the Special Landscape Areas.

Test C2 - As presently drafted Policy TWR3 does not comply with the aims and objectives of PPW as it does not provide the opportunity for existing holiday caravan parks to provide an increased contribution to the local economy thorough the provision of improved and additional pitch development. Furthermore, the policy as drafted discourages improvements to those holiday parks that are located in more sensitive locations such as AONB's and SLA's. This is a retrograde approach. It is imperative to recognise that the majority of existing holiday parks are located within the defined AONB and SLA designations in Gwynedd and Anglesey and it is important that holiday parks located in these designations are given the opportunity (and incentive) to undertake improved pitch layouts, with commensurate increases in pitch numbers, to lessen the impact of such sites in these designations. These development opportunities ultimately provide enhanced contributions to the local economy. If a holiday caravan park is able to provide significant environmental improvements as part of any development proposal then this is within the interest of the entire Plan area. This is particularly the case if the development will result in an improved setting on the surrounding landscape and enhanced employment and economic contributions. Plas Coch Holiday Park, Anglesey, is an excellent example of what can be achieved with environmental improvements on existing holiday caravan parks within the AONB if the correct policy framework is in place to encourage such planning applications to come forward.

Test CE1 - There is no sound reason for existing sites within the above land designations to be at a disadvantage to those outside of the area. The existing adopted planning policy in Gwynedd does not differentiate between sites inside or outside sensitive land designations and there is no justification for the introduction of such a division within an emerging policy.

As currently drafted there is no incentive for operators to improve caravan parks located within some of the most sensitive environmental locations. If additional pitches can be secured this would provide an incentive for park operators to improve their layouts and densities.

It will be noted from 4.4.3 of Topic Paper 9 (Tourism) that the majority of existing holiday parks are indeed located within the AONB and/or Special Landscape Areas it is, therefore, unacceptable to put these

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majority of parks at a disadvantage particularly as these are the sites that would provide the most benefit to the local landscape in terms of improvement.

Again, we would refer to the redevelopment of Plas Coch Holiday Park in Anglesey. The betterment and environmental improvements that have been achieved at this park, located within the AONB, are significant and could not be achieved by the criteria now proposed within the emerging Policy TWR3.

Newid(iadau) i'r Cynllun

Amended Policy1. Delete Point 32. Amend Point 4 to read:Proposals to improve existing static cara

Change(s) to the Plan

Amended Policy

1. Delete Point 3
2. Amend Point 4 to read:

Proposals to improve existing static caravan and chalet sites by:

- i. Minor extension to the site area, and/or
- ii. The relocation of units from prominent settings to less prominent locations and/or,
- iii. A minor increase in the number of units on site,

Will be permitted providing all of the following criteria can be met:

- iv. That the proposed development is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site;
- v. That the proposed development offers significant and permanent improvements to the design, layout and appearance of the site and its setting in the surrounding landscape;
- vi. In the case of a site located within the Coastal Change Management Area, that the proposed development is part of a scheme to improve the safety of occupiers of caravans or chalets;
- vii. That any increase in the number of static holiday caravan or holiday chalet units is minor and is commensurate with the scale of any improvements to the site;
- viii. Is appropriate when considered against other policies in the Plan

Profion Cadernid / Soundness Tests: iii, iv, viii

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Rhif Sylw / Rep Id: **223**

Enw / Name: **Lafarge Tarmac Trading Limited [2735]**

Rhan: **POLISI TWR3**

Section: **POLICY TWR3**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Mae defnyddiau hamdden a thwristiaeth yn ddefnyddiau hyfyw o dir sydd eisoes wedi'i ddefnyddio ar safleoedd cloddio mwynau y mae modd iddynt, unwaith y byddant wedi'u hadfer, ddarparu cyfleusterau megis cyfleoedd llety, gweryllfeydd, cabanau coed a meysydd carafanau lle bo'n briodol

Representation Summary:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Sylw Llawn / Full Representation:

Recreation and tourism uses are viable end uses of previously used land at mineral extraction sites that when restored can provide facilities such as hotel opportunities, camping sites, woodland lodges and caravan parks where appropriate.

Newid(iadau) i'r Cynllun

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Change(s) to the Plan

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Profion Cadernid / Soundness Tests: None

Policy TWR3: Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation

Point 3 of policy TWR3 states that within the Anglesey Coast AONB, Llŷn AONB and the Special Landscape Areas (SLA) proposals to improve existing static and chalet sites must conform to a number of criteria. Greenacres is situated within a SLA and therefore this policy will apply with regard to future potential development at the Park. Point 4 of policy TWR3 relates to sites outside the AONBs and SLA and is similar to point 3, however it also allows a minor increase in the number of units on site.

Bourne Leisure does not object to point 3 and 4 as the policy as currently drafted would allow the sensitive redevelopment of caravan parks which is key to maintaining the tourism offer in the plan area which in turn has a significant positive impact on the local economy. However, Bourne Leisure considers that it would be beneficial for the wording of this policy to be amended to embody a more positive and flexible approach whereby the constant state of change in tourism facilities is acknowledged, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. It is vital that the policy provides sufficient flexibility to allow this to happen.

Bourne Leisure endorses supporting paragraph 7.3.65 as it explains that the purpose of policy TWR3 is to promote improvements and upgrade the standard of tourist accommodation alongside reducing the impacts of these sites on the landscape. This approach is in accordance with Bourne Leisure's development aspirations which normally seek to reconfigure/redevelop sites in order to improve the overall quality of the holiday facilities alongside reducing impact on the local environment. This can be done by utilising sensitive landscaping techniques. Bourne Leisure endorses the policy aspiration of reducing impact on the landscape as the high quality natural environment is a key attraction for tourists. Indeed the Destination Management Plan 2013-2020 states that 54% of visitors visited Gwynedd because of the scenery/landscape.

Bourne Leisure endorses supporting paragraph 7.3.66 where it states:

"Outside the Areas of Outstanding Natural Beauty and Special Landscape Areas a minor increase in units on site may be approved providing it can be demonstrated that the proposal offers significant improvements to the site and reducing its landscape impact. Minor in relation to extending site area is not defined except in relation to an increase in the number of units and should be no greater than a 10% increase on the number at the time of the original application. However, because of the considerable variety in the size, nature and location of sites, each application will be assessed on its merit within this general guide."

Bourne Leisure considers it sensible to not define the size of the area that can be sought as part of redevelopment proposals. This is because some proposals may require a large site area however this area may be used as a buffer for landscaping purposes which has a positive impact on the local environment. Bourne Leisure also considers that it is sensible to assess each site on its own merit within this general guide. This is because of the wide variety of tourist accommodation in Gwynedd.

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Rhif Sylw / Rep Id: **458**

Enw / Name: **Bourne Leisure Ltd [2768]**

Rhan: **POLISI TWR3**

Section: **POLICY TWR3**

Math / Type: **Cefnogi / Support**

Crynodeb o'r Sylw:

Cefnogir agweddau o TWR3 gan ei fod yn hyrwyddo cynigion i wella safleoedd statig a silaes presennol cyn belled a'u bod nhw'n cydfynd a nifer o feini prawf.

Representation Summary:

Aspects of TWR3 are supported as it facilitates proposals to improve existing static and chalet sites provided they conform to a number of criteria.

Sylw Llawn / Full Representation:

Point 3 of policy TWR3 states that within the Anglesey Coast AONB, Llŷn AONB and the Special Landscape Areas (SLA) proposals to improve existing static and chalet sites must conform to a number of criteria. Greenacres is situated within a SLA and therefore this policy will apply with regard to future potential development at the Park. Point 4 of policy TWR3 relates to sites outside the AONBs and SLA and is similar to point 3, however it also allows a minor increase in the number of units on site.

Bourne Leisure does not object to point 3 and 4 as the policy as currently drafted would allow the sensitive redevelopment of caravan parks which is key to maintaining the tourism offer in the plan area which in turn has a significant positive impact on the local economy. However, Bourne Leisure considers that it would be beneficial for the wording of this policy to be amended to embody a more positive and flexible approach whereby the constant state of change in tourism facilities is acknowledged, with redevelopment and site rationalisation taking place at all times, to meet the needs of the dynamic tourism market. It is vital that the policy provides sufficient flexibility to allow this to happen.

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newid(iauau) i'r Cynllun

Change(s) to the Plan

Profion Cadernid / Soundness Tests: None

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **197**

Enw / Name: **Kingsbridge Caravan Park (Mr Andrew Bate) [2778]**

Rhan: **POLISI TWR3**

Section: **POLICY TWR3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Er y byddwn yn cytuno gyda'r bwriad i wrthod datblygu parciau NEWYDD yn yr AHNE, dylid rhoi ystyriaeth i'r bwriad i gyfyngu ar gynyddu nifer yr unedau mewn ardaloedd o AHNE. Gallai hyn esgor ar gynnydd yn y galw am ail dai gan ymwelwyr. Mae effeithiau hyn yn amlwg yn Rhosneigr a Threarddur. Hoffwn weld elfen o hyblygrwydd gyda phob cais yn cael ei gysidro ar ei deilyngdod ac efallai trafodaeth rhwng cynllunwyr a pherchenogion y parciau.

Representation Summary:

Whilst I would agree with the proposal to refuse the development of NEW parks within the AONB, consideration should be given to the proposal to restrict the increase in numbers of units in AONB areas. This may lead to increased demand for second homes from visitors. The effects of this are evident in Rhosneigr and Trearddur Bay.

I would like to see a degree of flexibility with each case considered on its own merits and perhaps negotiation between planners and park owners.

Sylw Llawn / Full Representation:

Whilst I would agree with the proposal to refuse the development of NEW parks within the AONB, consideration should be given to the proposal to restrict the increase in numbers of units in AONB areas. This may lead to increased demand for second homes from visitors. The effects of this are evident in Rhosneigr and Trearddur Bay.

Newid(iadau) i'r Cynllun

Hoffwn weld elfen o hyblygrwydd gyda phob cais yn cael ei gysidro ar ei deilyngdod ac efallai trafodaeth rhwng

Change(s) to the Plan

I would like to see a degree of flexibility with each case considered on its own merits and perhaps negotiation between planners and park owners.

Profion Cadernid / Soundness Tests: x

Sylwadau Dros y We / Representations via the Internet

Rhif Sylw / Rep Id: **198**

Enw / Name: **Kingsbridge Caravan Park (Mr Andrew Bate) [2778]**

Rhan: **7.3.66**

Section: **7.3.66**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Mae gosod terfyn o gynnydd o 10% mewn nifer yn rhoi'r parciau llai dan anfantais o gymharu â pharciau mawr sydd â niferoedd mawr o unedau ac mae'n rhoi mantais fasnachol annheg i'r parciau mwy.

Representation Summary:

Setting a limit of 10% increase in numbers is placing the smaller parks at a disadvantage compared to parks with large numbers of units and gives the large parks an unfair commercial advantage.

I would like to see the limit of 10% increase in numbers deleted and have each case considered on its merits. Small parks have particular problems with limited turnover and need an increase in numbers to recover costs associated with raising quality standards and environmental improvements.

Sylw Llawn / Full Representation:

Setting a limit of 10% increase in numbers is placing the smaller parks at a disadvantage compared to parks with large numbers of units and gives the large parks an unfair commercial advantage.

Newid(iadau) i'r Cynllun

Hoffwn weld y cyfyngiad o 10% yn cael ei ddileu a bod pob cais yn cael ei ddelio ar ei deilyngdod.

Change(s) to the Plan

I would like to see the limit of 10% increase in numbers deleted and have each case considered on its merits.

Profion Cadernid / Soundness Tests: x

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Rhif Sylw / Rep Id: **308**

Enw / Name: **Point Lynas Caravan Park/Pant y Saer Caravan Park (Mr**

Rhan: **POLISI TWR3**

Section: **POLICY TWR3**

Math / Type: **Gwrthwynebu / Object**

Crynodeb o'r Sylw:

Nid yw eitem 3 iii Polisi TW3 yn ddigon hyblyg i gyflawni nodau'r polisi. Cysidro cynnydd bychan yn niferoedd carafanau sefydlog neu siales ar y parc os gellid dangos ei bod angen ar gyfer i wneud cynllun gwella yn hyfyw.

Representation Summary:

Item 3 iii of Policy TW3 is insufficiently flexible to achieve the policy aims. A small increase in the number of static caravan or chalet pitches on the park will be considered if it can be shown that they are a requirement for an improvement scheme to be viable.

Sylw Llawn / Full Representation:

I accept that there is a need to conserve and enhance the AONB areas. Policy TW3 (explanation) states that the proliferation of static caravan and chalet parks has a detrimental impact on the landscape.

It follows from this that there is scope for improvements to layout and landscaping to reduce this impact.

The costs of developing proposals which meet the criteria are considerable. Any proposals which a park owner may wish to make can only be realistically progressed by engaging professional assistance. In addition to the cost of such assistance, a range of impact assessments will typically be required, the provision of which will incur further costs.

The outcome is that up front costs of the order of £10000 can easily be incurred for a comparatively modest scheme, before any consideration is given to the costs of implementing the scheme should planning permission be granted.

Paragraph 3 iii states that " the improvements does not increase the number of static or chalet units on the site."

If there is no possibility of a small number of additional units then the incentive to embark on any scheme will be significantly undermined, reducing the effectiveness of the policy in acheiving its objectives.

Newid(iadau) i'r Cynllun

Cysidro cynnydd bychan yn niferoedd carafanau sefydlog neu siales ar y parc os gellid dangos ei bod angen

Change(s) to the Plan

A small increase in the number of static caravan or chalet pitches on the park will be considered if it can be shown that they are a requirement for an improvement scheme to be viable.

Profion Cadernid / Soundness Tests: x

	 <p>CYNGOR SIR YNYSS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 2986 / 518</p> <p>Date received: 30/13/15 ebw</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Haulfryn Group Ltd	Jeremy Lambe Lambe Planning & Design Ltd
Address	[REDACTED]	
Postcode	[REDACTED]	[REDACTED]
Telephone Number	[REDACTED]	[REDACTED]
Email address	[REDACTED]	[REDACTED]

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp in the leaflet 'Guidance about alternative sites'.

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TWR3
Paragraph number (please specify)	7.3.64
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

<p>2c. Please provide details of your representation on the Deposit Plan.</p> <p>Paragraph 7.3.64 refers to no increase in caravan or chalet numbers. A minor increase in the number of static holiday caravan and holiday chalet units should be permitted when the proposal is part of a scheme to improve the range and quality of tourist accommodation and facilities on the site.</p> <p>In virtually all cases, to assist with funding the upgrading proposals on Holiday Parks, a minor increase in the number of static holiday caravans or holiday chalet units is required. The upgrading usually involves significant investment by the Holiday Park owner to increase spacing on the Park, improve landscaping, relocate pitches and upgrade facilities.</p> <p>Without a minor increase to the number of pitches, it may not be possible to fund the upgrading proposals, particularly where this involves relocation of pitches to new areas, as major investment is required in locating services and additional landscaping.</p> <p>Where Holiday Parks are located within the Coastal Change Management Zone (within the AONB) and relocation of pitches are required due to a "rollback" position from the shoreline, a minor increase in the number of pitches should be allowed to assist with funding the re-location of holiday pitches and the significant investment required.</p> <p>The current wording in paragraph 7.3.64 does not allow this to happen.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

2d. Please detail the changes you wish to see made to the Deposit Plan.

In relation to Policy TWR3 paragraph 7.3.64

Delete the sentence in paragraph 7.3.64 which states "but without an increase in caravan or chalet numbers" and replace with "and a minor increase in units on site may be approved providing it can be demonstrated that the proposal offers significant improvements to the site and reducing its landscape impact. Minor in relation to extending site area is not defined except in relation to an increase in the number of units....."

2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency				Coherence & Effectiveness											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

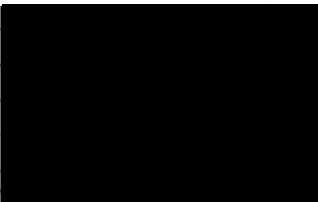
Submission of documents and evidence to the examination

Publish Inspector's report

Plan's adoption

If additional documents have been provided to support your representations, please list below:

Signed:



Dated: 30th March 2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

Completed representation forms should be returned to the Joint Planning Policy Unit at:

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**



CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

Date acknowledged:

**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Caravan Club	Duncan Parr
Address	C/O Agent	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

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PART 2: Your Comments and Suggested Changes. *(Please use one Part 2 section for each comment that you wish to make)*

2a. Which part of the Deposit Plan are you commenting on?	
Policy number <i>(please specify)</i>	PSS11, TWR3, TWR4
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

<p>2c. Please provide details of your representation on the Deposit Plan.</p> <p>Please see attached Representation Letter for further details.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

In summary the policies relating to tourist accommodating are considered to be overly restrictive and lacking in clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not effect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.

2d. Please detail the changes you wish to see made to the Deposit Plan.

Please see Representation Letter for full details

2dd. Is the Deposit Plan sound?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails?
(Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input type="checkbox"/>

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3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

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Publish Inspector's report

Plan's adoption

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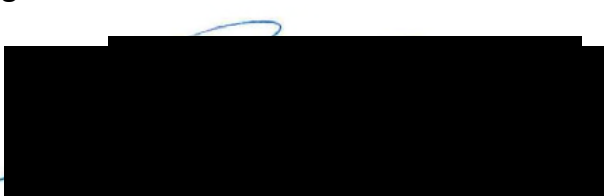
Site Location Plan

Site Plan

Indicative Lodge Layout

Representation Letter

Signed:



Dated: 30/03/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

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Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is “sound”. This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of “*showing good judgement*” and “*able to be trusted*”. To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector’s job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - ‘Procedural’ (2 tests); ‘Conformity’ (4 tests); and ‘Coherence and Effectiveness’ (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the ‘consistency’ and the ‘coherence and effectiveness’ tests.

30 March 2015

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

Joint Planning Policy Unit
1st Floor
Bangor City Council Offices
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Dear Sirs

Representation to the Joint Planning Policy Deposit Plan consultation with regards to Penrhos Caravan Club Site, Brynteg, Anglesey, LL78 7JH

This letter accompanies our representation to the Joint Deposit Plan on behalf of the Caravan Club. Penrhos is located to the south west of Brynteg and currently serves as a touring caravan site. This representation seeks for amendments and clarification on policies relating to visitor accommodation and caravan sites including policies PSS11, TWR3 and TWR4. The key theme of this representation is as to whether the development of lodges on existing caravan sites is acceptable under the emerging Joint Local Plan. Provided with this representation is a completed representation form, site location plan, site plan and indicative Lodge design.

Penrhos Caravan Club site is located to the south west of Brynteg and is accessed via a private road from the B5110. The site has an area of approximately 3.84ha and is comprised of 3 main areas, there is an open field located to the north west of the B5110 which is used for dog walking, a small field to the north of this which incorporates a number of hardstanding pitches and existing buildings and a further larger field to the west which has a mixture of hardstanding and grass pitches. The site as a whole has 89 pitches, 52 of which are hardstanding. Within the site there are a number of internal roads and existing buildings which accommodate a site shop, information room, toilet and shower blocks and a laundry. The majority of the site is set well back from the main road and is well screened by existing mature hedgerows and trees. Given the level of existing development on the site, the two main touring caravan fields constitute previously developed, Brownfield land.

The site is located in a rural location but is surrounded by neighbouring caravan sites to the north east and south west, the wider area is characterised by open countryside. The site is located close to Brynteg which is approximately 1km from the site, this settlement offers amenities and facilities including restaurants, take aways, a convenience shop and post office. Benllech is located approximately 3.8km from the site and this settlement has a wide range of facilities. There is a bus stop located approximately 1km away in Brynteg which provides links to Amlwch, Llannerch-y-medd, Marian Glas, Benllech, Pentraeth, Porthaethwy, Ysbyty Gwynedd and Bangor (no.63). Therefore this site is considered to be a sustainable location.

The emerging policies relating to tourism and holiday accommodation are currently unclear as to whether the development of chalet style lodges on existing touring caravan sites is acceptable. The policies as set out in the Deposit Plan appear contradictory and do not allow sufficient flexibility to allow for sensitive future development at the site to meet modern tourists needs.

National Policy Context

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Planning Policy Wales 2014, is one of the key national planning policy documents for Wales and sets out the land use planning policies of the government. The following guidance is relevant to this representation.

The plan states that in Wales sustainable development means enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own generations in ways which:

- promote social justice and equality of opportunity; and
- enhance the natural and cultural environment and respect its limits – using only our fair share of the earth’s resources and sustaining our cultural legacy.

Paragraph 4.2.2 states that the planning system should provide for a “presumption in favour of sustainable development” to ensure that social, economic and environmental issues are balanced and integrated.

Paragraph 4.6.3 states that the priorities for rural areas are to secure:

- sustainable rural communities with access to affordable housing and high quality public services;
- a thriving and diverse local economy where agriculture-related activities are **complemented by sustainable tourism** and other forms of employment in a working countryside; and
- an attractive, ecologically rich and accessible countryside in which the environment; and
- biodiversity are conserved and enhanced.

Paragraph 4.9.1 states that previously developed (or Brownfield) land should, wherever possible, be used in preference to Greenfield sites, and that previously developed land is that which “is or was occupied by a permanent structure, excluding agricultural or forestry buildings, and associated fixed surface infrastructure”.

Paragraph 7.1.1 defines economic development as “development of land and buildings for activities that generate wealth, jobs and incomes”. Economic land uses include retail, tourism, and public services.

Paragraph 7.3.2 relates to employment in rural locations and states that “new development will be required in many areas” in order to create employment. Furthermore it states that the **expansion of existing businesses located in the open countryside should be supported** provided there are no unacceptable impacts on local amenity.

Paragraph 11.1.1 relates to Tourism and states that it is “vital to economic prosperity and job creation in many parts of Wales” and that “tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas”.

Paragraph 11.1.4 states that tourism involves a wide range of activities, facilities and types of development throughout Wales and the planning system should encourage sustainable tourism in ways which enable it to contribute to “**economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and those of local communities**”.

Paragraph 11.1.7 relates to tourism in rural areas, and states that “**tourism-related development is an essential element in providing for a healthy, diverse, local and national economy**”. Tourism can contribute to the provision and maintenance of facilities for local communities. In rural locations development should be sympathetic in nature and scale to the local environment and to the needs of visitors and the local community. Paragraph 11.1.9 states that development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land.

Emerging Local Policy Context

The emerging policy relating to tourism and caravan sites is currently unclear and the key messages appear to be conflicting.

Emerging Strategic Policy PS11 – The Visitor Economy states that whilst ensuring the compatibility with the local economy and communities and ensuring the protection of natural, built and historic environment the Councils will support the development of a year round local tourism industry by:

- *Protecting and enhancing existing serviced accommodation and supporting the provision of new high quality serviced accommodation in or near the sub-regional, urban and rural service centres and villages;*
- *Managing the provision of high quality un-serviced tourism accommodation in the form of camping, alternative luxury camping, static or touring caravan or chalet parks.*

Under this policy the development of chalet style accommodation on part of the site at Penrhos Caravan Club site would be acceptable provided it contributed to the local economy and has no negative impacts on the environment.

Emerging Strategic Policy TWR2 - Holiday Accommodation states that proposals for, the development of new permanent serviced or self serviced holiday accommodation or extending existing holiday accommodation establishments will be permitted provided they are of a high quality in terms of design, layout and appearance and that all the following criteria can be met:

- *In the case of new build accommodation that the development is located within a development boundary or makes use of a suitable previously developed site;*
- *That the proposed development is appropriate in scale, considering the site, location and/or settlement in question;*
- *That the proposal will not result in a loss of permanent housing stock;*
- *That the development is not sited within a primarily residential area or does not significantly harm the residential character of an area;*
- *That the development does not lead to an over concentration of such accommodation within the area.*

Under this policy Penrhos Caravan Club site can meet the criteria for the development of new holiday accommodation in the form of holiday style lodges. The site is previously developed land and the design and layout of the lodges would ensure that the scale of the development is appropriate to the site. There would be no loss of residential stock or harm to residential character. The criteria relating to development not leading to an over concentration of one type of accommodation within the area is not clear given the wide range of accommodation provision in the rural parts of the plan area this would be difficult to show. Providing this could be shown, under this policy the development of lodges on part of Penrhos Caravan Club would be acceptable.

Under emerging policy TWR3 the development for new static caravan or holiday chalet sites will be granted only under the following circumstances:

- *It can be demonstrated that it doesn't lead to a significant intensification in the provision of static caravan or chalet or permanent alternative camping sites in the locality; and*
- *That the proposed development is of a high quality in terms of design, layout and appearance and is site in an unobtrusive location which is well screened by existing landscape features and/or where the units can be easily assimilated into the landscape in a way which does not significantly harm the visual quality of the landscape; and*
- *That the site is close to the main highway network and that adequate access can be provided without significantly harming the landscape characteristics and features.*

It is unclear as to whether this policy is applicable to proposals for the development of chalet style lodges on *existing touring caravan sites*. Penrhos Caravan Club site has the potential to meet all of the criteria set out in this policy however the policy does not make it clear as to whether this would be acceptable. Should this not be acceptable under this policy this will create an overly restricted system which does not allow sufficient flexibility for rural businesses such as caravan sites to adapt to changing economic circumstance. A greater level of flexibility and clarity is sought, in order to support the rural tourist industry which provides a significant level of employment in the local area as well as supporting other local businesses.

Emerging Policy TWR4 - Holiday Accommodation states that proposals for new self serviced accommodation, static caravan and chalets...will be granted provided it can be demonstrated that the accommodation is being used exclusively for holiday purposes and does not become the occupants main or sole place of residence.

Under this policy the development of Lodges on Penrhos caravan club site would be acceptable.

Amendments to Emerging Policies

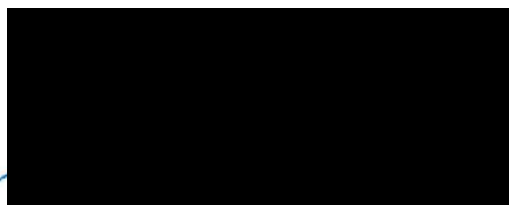
In order to provide clarity on the development of alternative accommodation on existing caravan sites the emerging policy should be amended. The current policy is not specific to this type of development and is in places contradictory. National Policy supports development relating to tourism provided that it meets the criteria for sustainable development. If the various relevant policies are restricting the ability of tourism businesses to adapt to the changing needs of visitors this could have a negative impact on the local economy particularly in rural areas.

For example given its location and current use Penrhos Caravan Club site is considered to be a Brownfield site in a sustainable location. The development of chalet style lodges on part of this site will not result in a huge loss of touring caravan accommodation and will allow for the site to meet the needs of a wider range of visitors. Given that the site accommodates touring caravans currently, is well screened and set back from the main road the development of lodges will not have a significant impact on the surrounding environment. The chalet style lodges, an example of which is included in this representation, are easily integrated into the landscape and in many ways are more sensitive to the rural location of the site than the touring caravans that currently occupy the site. There is an increasing demand for such accommodation so having a policy framework that supports such appropriate development in sustainable locations going forward is important.

Conclusion

The emerging policies relating to the development of visitor accommodation in particular policies PSS11, TWR2, TWR3 and TWR4 are currently unclear and none relate specifically to the provision of chalet style lodges on existing touring caravan sites. Generally under these policies such a development on Penrhos caravan club site would be acceptable, however this position should be clarified within the emerging policy. Policy must ensure that it does not overly restrict development on existing caravan sites including the change in the type of accommodation. The ability of local tourism businesses to cater to the changing needs of the visitor economy is key to the continued viability of such businesses and will ensure their continued support of rural communities in terms of employment and visitor spending.

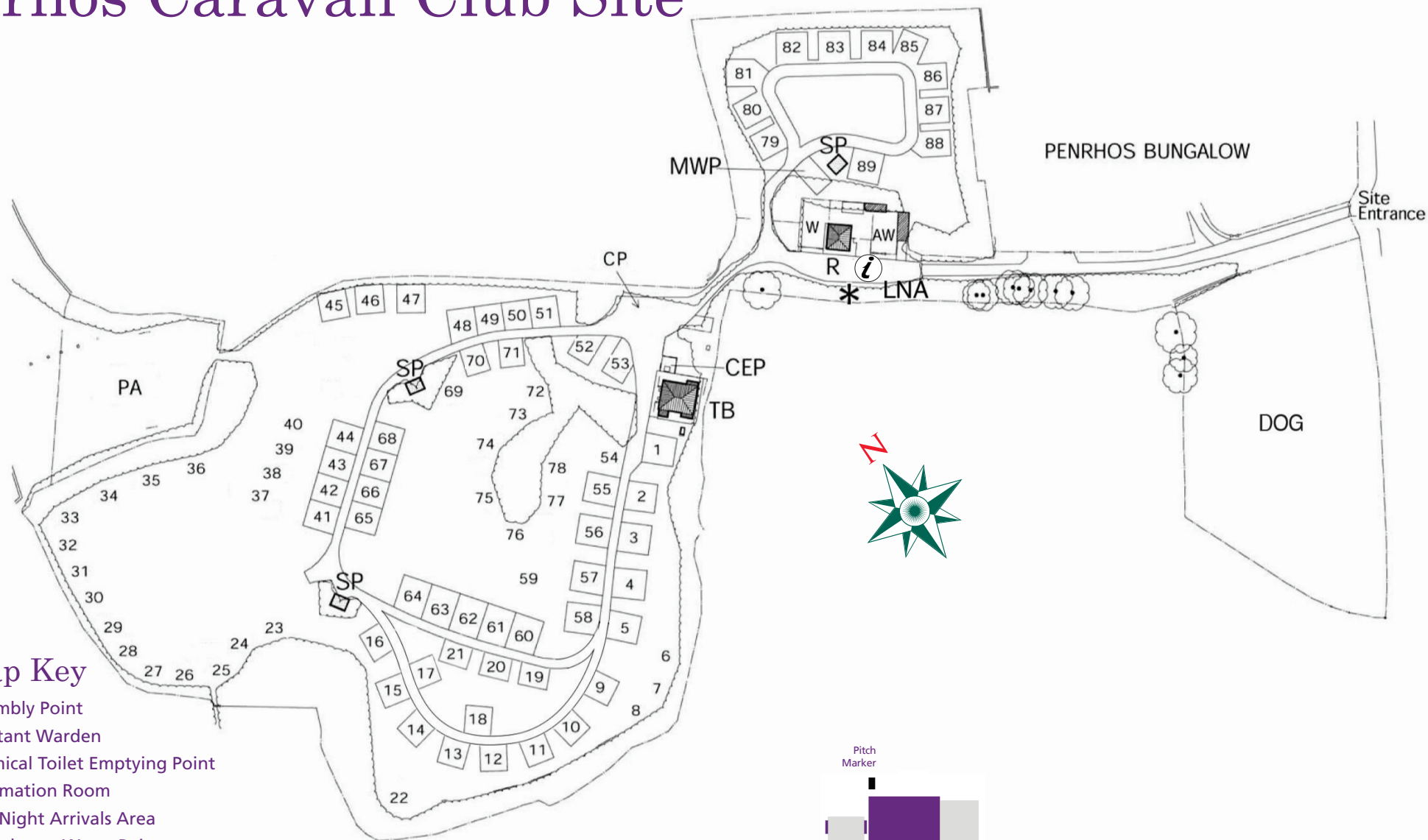
Yours faithfully



Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI
Director

Encs. Representation Form, Site Location Plan, Site Plan and Indicative Lodge Design.

Penrhos Caravan Club Site

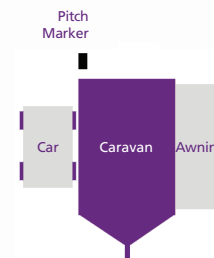


Site Map Key

- * Assembly Point
- AW Assistant Warden
- CEP Chemical Toilet Emptying Point
- (i) Information Room
- LNA Late Night Arrivals Area
- MWP Motorhome Waste Point
- R Reception
- SP Service Point
- TB Toilet Block
- W Warden
- DOG Dog Walk
- PA Play Area
- CP Car Park

Pitch Guide

Pitch type	Peg colour	Pitch numbers
Standard with awning	White	2 – 35, 37 – 53, 55 - 89
Standard without awning	Blue	1, 36, 54



Please park with offside of caravan or motorhome to the numbered side of the pitch marker. If you wish to park a different way round please check with the warden.



	 CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL	<i>For office use only:</i> Representor No. 3039/3035/790 Date received: 31/3/15 Date acknowledged:
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Caravan Club	Duncan Parr
Address	C/O Agent	[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]
Email address		[REDACTED]

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

If you wish to delete a site that is allocated in the Deposit Plan or suggest amendments to it or you wish to propose a new site, please attach a 1:1250 or 1:2500 scale plan that clearly identifies the site boundaries. If you are proposing a new site (one that is not included within the Deposit Plan) the comment form must be accompanied by a detailed site assessment in accordance with the Council's Candidate Site assessment methodology and the Sustainability Appraisal framework. The Candidate Site assessment methodology and the Sustainability Appraisal framework can be found on the Council's website at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

Further information about this matter can be obtained from the Joint Planning Policy Unit on **01286 685003** or on the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp in the leaflet 'Guidance about alternative sites'.

Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant Sustainability Appraisal information. This information must be consistent with the scope and level of detail of the Sustainability Appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

- PART 2: Your Comments and Suggested Changes. *(Please use one Part 2 section for each comment that you wish to make)*

2a. Which part of the Deposit Plan are you commenting on?	
Policy number <i>(please specify)</i>	TWR3
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	
Constraints Map	
Appendices <i>(please specify)</i>	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

<p>2c. Please provide details of your representation on the Deposit Plan.</p> <p>Please see attached Representation Letter for further details.</p> <p style="text-align: right;"><i>Please use additional sheet if necessary. Please state how many additional sheets have been used.....</i></p>

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

In summary Policy TWR3 is overly restrictive and lack clarity on the type of development which is acceptable on existing touring caravan sites. The policy should be amended to ensure that the plan does not effect the ability of local tourist businesses from adapting to the changing needs of the visitor economy and does not impact on the future economic viability of these businesses which support local economies, employments and communities.

2d. Please detail the changes you wish to see made to the Deposit Plan.

Please see Representation Letter for full details

2dd. Is the Deposit Plan sound?

Yes



No



2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural				Consistency								Coherence & Effectiveness							
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination

Publish Inspector's report

Plan's adoption

If additional documents have been provided to support your representations, please list below:

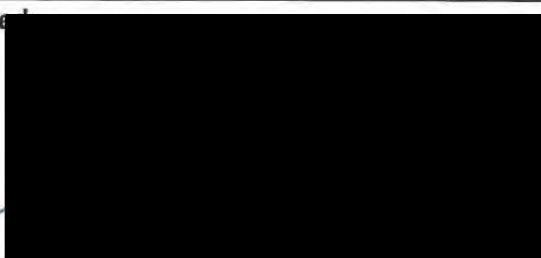
Site Location Plan

Site Plan

Indicative Lodge Layout

Representation Letter

Signed



Dated: 30/03/2015

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

Completed representation forms should be returned to the Joint Planning Policy Unit at:

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of "*showing good judgement*" and "*able to be trusted*". To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector's job to consider whether the Plan is sound.

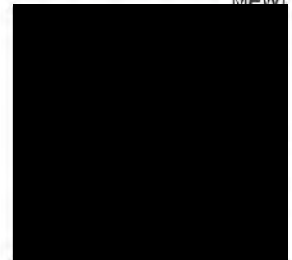
Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the 'consistency' and the 'coherence and effectiveness' tests.

30 March 2015



Joint Planning Policy Unit
1st Floor
Bangor City Council Offices
Fford Gwynedd
Bangor
Gwynedd
LL57 1DT

Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog
MEW



Dear Sirs

Representation to the Joint Planning Policy Deposit Plan consultation with regards to Cae Mawr Caravan Club Site, Llangefni Road, Benllech, Anglesey, LL73 8NY

This letter accompanies our representation to the Joint Deposit Plan on behalf of the Caravan Club. Cae Mawr caravan site is located to south west of Marian Glas and currently serves as a touring caravan site. This representation seeks to amend Policy TWR3 – Static Caravan and Chalet Sites and Permanent Alternative Camping Accommodation in relation to the development of lodges on existing caravan sites. Provided with this representation is a completed representation form, site location plan, site plan and indicative Lodge design.

Cae Mawr Caravan Club site is located to the south west of Marian Glas on Llangefni Road from which the site is accessed. The site has an area of approximately 2.5ha and includes 74 pitches, 41 of which are hardstanding pitches. Within the site are a number of internal roads and existing buildings which accommodate a site shop and information room. Given the level of existing development on the site, this site constitutes a previously developed, Brownfield site. The site is well screened by mature hedgerows and trees. The site is located in a rural location within a Special Landscape Area.

The neighbouring site to the west is a static caravan site/chalet site and to the east are a number of small residential bungalows. Directly outside the site on Llangefni Road is a pavement allowing pedestrians to safely walk to Marian Glas and there are a number of additional walking routes throughout the local area. Approximately 500m from the site is a bus stop located on Llangefni Road which provides services from Bangor to Llannerchymedd (no.63) and Llanallgo to Moelfre and Benllech (no.51).

This site is in close proximity to a number of settlements including Brynteg approximately 1.9km to the south west and Benllech approximately 3km to the south east. Benllech has a number of facilities and amenities including food shops, cafes and restaurants. The site is therefore deemed to be a sustainable location.

Under emerging policy TWR3 Development of new static caravan or chalet accommodation on sites within a Special Landscape Area will be refused. This will include existing touring caravan sites in the Special Landscape areas and will prevent such sites being able to evolve over time to provide more modern forms of accommodation. This policy is overly restrictive and does not allow sufficient flexibility to allow for rural businesses such as caravan sites to adapt to changing economic circumstances and modern trends. A greater level of flexibility is sought to support the rural tourist industry which provides a significant employer in the local areas as well as supporting other local businesses.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Registered office: 33 Margaret Street, London, W1G 0JD

National Policy Context

Planning Policy Wales 2014, is one of the key national planning policy documents for Wales and sets out the land use planning policies of the government. The following guidance is relevant to this representation.

The plan states that in Wales sustainable development means enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own generations in ways which:

- promote social justice and equality of opportunity; and
- enhance the natural and cultural environment and respect its limits – using only our fair share of the earth's resources and sustaining our cultural legacy.

Paragraph 4.2.2 states that the planning system should provide for a "presumption in favour of sustainable development" to ensure that social, economic and environmental issues are balanced and integrated.

Paragraph 4.6.3 states that the priorities for rural areas are to secure:

- sustainable rural communities with access to affordable housing and high quality public services;
- a thriving and diverse local economy where agriculture-related activities are **complemented by sustainable tourism** and other forms of employment in a working countryside; and
- an attractive, ecologically rich and accessible countryside in which the environment; and
- biodiversity are conserved and enhanced.

Paragraph 4.9.1 states that previously developed (or Brownfield) land should, wherever possible, be used in preference to Greenfield sites, and that previously developed land is that which "is or was occupied by a permanent structure, excluding agricultural or forestry buildings, and associated fixed surface infrastructure".

Paragraph 5.3.11 relates to non-statutory designations, including Special Landscape Areas which should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. These areas are given a degree of protection however **such designations should not unduly restrict acceptable development.**

Paragraph 7.1.1 defines economic development as "development of land and buildings for activities that generate wealth, jobs and incomes". Economic land uses include retail, tourism, and public services.

Paragraph 7.3.2 relates to employment in rural locations and states that "new development will be required in many areas" in order to create employment. Furthermore it states that the **expansion of existing businesses located in the open countryside should be supported** provided there are no unacceptable impacts on local amenity.

Paragraph 11.1.1 relates to Tourism and states that it is "vital to economic prosperity and job creation in many parts of Wales" and that "tourism can be a catalyst for environmental protection, regeneration and improvement in both rural and urban areas".

Paragraph 11.1.4 states that tourism involves a wide range of activities, facilities and types of development throughout Wales and the planning system should encourage sustainable tourism in ways which enable it to contribute to **"economic development, conservation, rural diversification, urban regeneration and social inclusion, recognising the needs of visitors and those of local communities"**.

Paragraph 11.1.7 relates to tourism in rural areas, and states that **"tourism-related development is an essential element in providing for a healthy, diverse, local and national economy"**. Tourism can contribute to the provision and maintenance of facilities for local communities. In rural locations development should be sympathetic in nature and scale to the local environment and to the needs of visitors and the local

community. Paragraph 11.1.9 states that development for tourism, sport and leisure uses should, where appropriate, be located on previously developed land.

Emerging Joint Local Plan

The emerging Joint Local Plan which is the subject of this consultation has a number of policies relating to tourism and holiday accommodation and Special Landscape Areas.

Policy AMG1 relates to Special Landscape Areas and sets out that when considering proposal within Special Landscape Areas (SLA) there will be a need to appropriately consider the scale and nature of development ensuring that there is no detrimental impact on the landscape. The development should aim to add historic, visual, geographical, ecological and cultural features of the SLA.

This representation relates to Policy TWR3 – Static Caravan and Chalet Sites and Permanent Alternative Accommodation. This policy states that *"Proposals for the development of new static caravan, holiday chalet sites or permanent alternative camping accommodation will be refused within the AONB and Special Landscape Areas"*. It is unclear as to whether this policy would include existing touring caravan sites in the Special Landscape Area. There is no specific provision for the change of accommodation type on existing caravan sites within the Joint Deposit Plan.

Alterations to Policy TW3

Currently this policy is overly restrictive on existing touring caravan sites within the Special Landscape Areas. The policy currently allows for no changes to be made on touring sites in the special landscape areas. It is not clear as to whether the change in the type of accommodation on existing caravan sites would be acceptable. For example the Caravan Club wish to in the future incorporate chalet style lodges on this site and under this policy it is unclear as to whether this would be acceptable. If this type of change in accommodation is unacceptable on sites such as Cae Mawr, this policy is restricting the ability of the Caravan Club to adapt to the changing needs of current and future club members and is in our view contrary to the Planning Policy Wales 2014.

The policy does not sufficiently address the diversification of existing sites which would allow the business to meet the changing needs of the visitor economy and ensure the future economic viability of such tourism businesses. Cae Mawr caravan site along with others in the area attracts visitors to the area and supports local employment and businesses and their future viability should not be restricted by this policy. Policy AMG1 is not overly restrictive on the type of development appropriate in Special Landscape Areas it does however set a criteria for any development which may occur. This approach allows further flexibility in the type of development acceptable and allows for individual sites to be assessed on their own merits.

The design of any potential new lodges would be of high quality to ensure that they would have no significant impact on the surrounding landscape. An example of a wooden chalet style lodge is provided within this representation and this style of lodge would be easily integrated into the surroundings in many ways more so than the existing caravans. Although more permanent structures in their nature, given the existing hardstanding on the site and the well screened nature of the site this change would have limited further impact on the Special Landscape Area.

Policy TWR3 does not currently allow for the individual assessment of sites within the Special Landscape Area, some sites such as Cae Mawr may be appropriate for this type of development given the well screened nature of the site and the careful design of the lodge buildings. However under this policy this will not be taken into account on a site such as Cae Mawr.

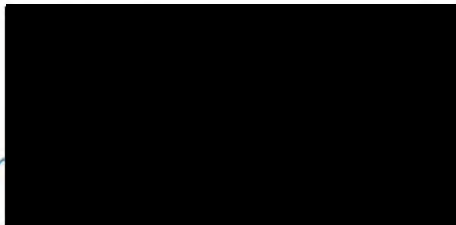
National Policy for Wales states that tourism development should be undertaken on previously developed land, which under this policy document Cae Mawr is considered to be. The plan also states that while Special Landscape Areas should be protected they should not "unduly restrict development".

Conclusion

Cae Mawr Caravan Club Site is a successful site which contributes to sustainable economic development in a rural part of Wales. The site provides for visitors and helps to secure local employment and visitor spending in the local area. Despite being located within a Special Landscape Area which should be protected from inappropriate development, this site is suitable for certain forms of sensitive development such as the chalet style lodges proposed.

Emerging Policy TWR3 is currently overly restrictive on the type of development which is acceptable on existing touring sites within the SLA. If this policy is not altered it may contribute to the decline in tourism accommodation in the area as businesses will not have the ability to adapt to the changing needs of visitors. This is clearly contrary to national policy. We therefore consider a more site specific flexible approach should be taken to prevent unnecessary burden on the tourist industry and businesses such as the Caravan Club.

Yours faithfully



Duncan Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI
Director


Encs. Representation Form, Site Location Plan, Site Plan and Indicative Lodge Design.

Cae Mawr Caravan Club Site



Please park with offside of caravan or motorhome to the numbered side of the pitch marker. If you wish to park a different way round please check with the warden.

Site Map Key

- * Assembly Point
- CEP Chemical Toilet Emptying Point
-  Information Room
- MWP Motorhome Waste Point
- R Reception
- SP Service Point
- W Warden



Pitch Guide

Pitch type
Standard with awning

Peg colour
White

Pitch numbers
1 - 73



Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn

Dynodwyd Ardal o Harddwch Naturiol Eithriadol (AHNE) Llŷn yn 1957 o dan Ddeddf Parciau Cenedlaethol a Mynediad i Gefn Gwlad 1949. AHNE Llŷn oedd yr 3ydd ardal i'w dynodi drwy Gymru, Lloegr a Gogledd Iwerddon.

Sefydlwyd Cydbwyllgor Ymgynghorol Ardal o Harddwch Naturiol Eithriadol Llŷn yn 1997 yn dilyn cyfarfod rhwng Cyngor Gwynedd, Cyngor Cefn Gwlad Cymru ac amrywiol sefydliadau eraill. Un o gyfrifoldebau'r Cydbwyllgor yw cyngor ar Gynlluniau Datblygu, strategaethau a rhaglenni gwaith yr awdurdod lleol a chyrrff eraill i'r graddau eu bod yn ymwneud â'r AHNE.

Yn y cyfarfod o'r Cydbwyllgor Ymgynghorol AHNE Llŷn a gynhaliwyd ar 25ain o Fawrth 2015 trafodwyd y Cynllun Datblygu Lleol Gwynedd a Môn 2011-26 a gwnaed y sylwadau canlynol:

1. **AHNE** - nid oes polisi penodol o ran cynnal a gwarchod yr AHNE. Yn hytrach mae polisïau cyffredinol a chyfeiriad at ddeddwriaeth a pholisi cenedlaethol. Credir fod angen polisi penodol ar gyfer cynnal a chadw'r AHNE, tebyg i Bolisi B8 yn y Cynllun presennol.
2. **AMG 1** - Ardaloedd Tirwedd Arbennig. Mewn rhai manau mae'r ardal yma (ATA Gorllewin Llŷn) yn ffinio gyda AHNE Llŷn ac yn creu gwarchodiad i osodiad yr AHNE. Fodd bynnag, mae rhai rhannau o'r AHNE heb y warchodaeth yma. Credir felly dylid cyfeirio at warchod gosodiad yr AHNE yn y polisïau perthnasol felly (gweler 5 isod).
3. **AMG 2** - Mae'n bolisi canmoladwy ond braidd yn gymhleth a chredir y gall fod yn anodd ei weithredu.
4. **AMG 3** - Dynodiad lleol yw'r Arfordir Treftadaeth sydd yn dilyn ffin arfordirol yr AHNE i raddau helaeth yn Llŷn. Credir y dylai'r polisi adlewyrchu'r dynodiad yn fwy cadarnhaol drwy roi mwy o warchodaeth i'r AT.
5. **Polisi ADN 1** – Ynni Gwynt ar y Tir. Anghytunir â'r polisi:
 - Credir y dylid cadw at y polisi presennol (C26) o ddim tyrbinau yn yr AHNE.
 - Hefyd peidio a chaniatau tyrbeini uwch na 11m o fewn gweledd yr AHNE.
 - Dylid defnyddio'r term "tyrbin" yn hytrach na "melin" sydd yn wahanol.
 - Credir y dylai maen prawf 2 gyfeiro at warchod gosodiad yr AHNE.
 - Mae pryder am y categorïau a dynodi datblygiadau dan 5MW fel rhai "Bach".
6. **Polisi ADN 2** – Technoleg Ynni Adnewyddadwy arall. Credir fod y polisi hwn yn rhy benagored o ran cynigion tu allan i ffiniau datblygu a dylid ei gryfhau.
7. **Polisi TWR 3** - Carafanau Sefydlog a Siale a Llety Gwersylla Amgen Parhaol. Cefnogir y polisi hwn gan y bwriedir gwrthod safleoedd newydd ac estyniadau o fewn yr AHNE a'r ATA.

8. **Polisi TWR 4** – Deiliadaeth Gwyliau. Roedd pryder am ganiatáu i safleoedd carafannau sefydlog/ sialetau fod yn agored 12 mis y flwyddyn. Heb adnoddau digonol i ellir monitro'r sefyllfa a mae posibilrwydd o fyw'n barhaol yn yr unedau – heb dalu trethi.
9. **Polisi TWR 5**- Safleoedd Carafannau Teithiol, Gwersylla a Llety Gwersylla Amgen dros dro. Roedd aelodau wedi sylw fod cynydd mewn ceisiadau a chryn bwysedd gan y math yma o ddatblygiad yn ardal Llŷn. Gofynwyd os sail i'r polisi ac oedd yna ddadansoddiad o gynydd mewn unedau/ effaith datblygiadau newydd wedi ei wneud? Credir y dylai'r polisi fod yn fwy caeth oddi mewn, a gerllaw, yr ardal ddynodedig.
9. **Polisi PCYFF 2 – Dylunio a Siapio** – credir y dylai fod cyfeiriad penodol at ddylunio safonol sy'n gweddu i'r cyd-destun yn yr AHNE.
10. **Gorfodaeth.** Credir fod angen blaenoriaeth i fonitrio cydymffurfiaeth hawl cynllunio, amodau cynllunio, amodau tirweddu ac amodau preswyliaeth.
11. **Cynllun Rheoli'r AHNE** – mae hwn yn gynllun statudol a chreir y dylai fod cyfeiriad penodol ato yn y polisiau perthnasol.
12. **Tai newydd.** Roedd pryder am lefel y ddarpariaeth dai yn ardal Llŷn ac effaith posibl hynny ar y gymdeithas a lles yr Iaith Gymraeg. Yn benodol roedd pryder am y ddarpariaeth ym Motwnnog a Phwllheli sydd yn ymddangos yn ormodol o ystyried maint a chymeriad yr anheddleoedd.